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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 ROLANDO LEZAMA,)
16 Plaintiff,) Case No. 2:17-cv-00086-JAD-VCF
17 vs.)
18 CLARK COUNTY, a political subdivision,)
19 and municipality including its department,)
20 CLARK COUNTY, DEPARTMENT OF)
21 AVIATION,)
22 Defendant.)
23 _____)
24)
25)
26)
27)
28)

19 COMES NOW, Plaintiff, named above, by and through his counsel of record,
20 Michael P. Balaban, Esq. and Defendants, named above, by and through their counsel
21 of record, Whitney J. Selert, Esq. stipulate, agree and make a joint application to extend
22 the discovery cut-off and related dates for a period of sixty (60) days up to and
23 including May 21, 2018. The present discovery cut-off date is March 21, 2018 and no
24 calendar call date or trial date has been set. This is the second request for an extension.

25 This stipulation is made and based upon the following factors:

26 Both parties have been working diligently to complete the discovery in this
27 case, and the current discovery cut-off is seven (7) days away.

1 To date the parties have both made their initial disclosures to the other side, and
2 both Plaintiff and Defendants have propounded interrogatories and requests for
3 production of documents, which have been responded to. Defendants have also
4 propounded requests for admissions on the Plaintiff, which have also been responded
5 to. Defendants have also designated an expert witness.

6 Plaintiff has noticed and completed the depositions of Sandy Jeantete, Letty
7 Bonilla, and Terrence McCarthy, all of whom are employees of Defendants.
8 Defendants have noticed and completed the deposition of Plaintiff. Defendants have
9 also filed a motion to compel Ms. Ann Nichols, a health care provider of Plaintiff, to
10 provide discovery. Plaintiff has stated that he does not intend to oppose this motion to
11 compel.

12 In addition, it has recently been discovered that Mrs. Levis Amelia Lezama, in
13 her current divorce proceedings against the Plaintiff, has raised issues directly relevant
14 to the subject case. Defendants have notified Plaintiff that they may depose Mrs. Levis
15 Amelia Lezama. Further, Plaintiff has notified Defendants that he may depose two
16 additional witnesses.

17 As set forth above, the attorneys for the parties have diligently worked to
18 complete discovery as expediently as possible and will continue to try to complete the
19 remaining discovery in an expedient manner.

20 Given the aforementioned, the parties request that the discovery period be
21 extended as follows:

- 22 1. Current discovery cut-off date of March 21, 2018 be extended to:
23 **May 21, 2018.**
- 24 2. Current date to file dispositive motions of April 23, 2018 be extended to:
25 **June 22, 2018.**
- 26 3. Current date to file the pre-trial order of May 23, 2018 be extended to:
27 **July 23, 2018.¹**

28 ¹ Or thirty (30) days after the decision on the last dispositive motion.

1 Based on the foregoing, the parties believe there is good cause for the requested
2 extension. In accordance with LR 26-4 the parties understand that any further requests
3 for discovery extensions must be made no later than twenty-one days before the new
4 proposed discovery cut-off date (i.e., May 21, 2018), or no later than twenty-one days
5 before any other deadline sought to be extended.

6

7 Dated this 15th day of March, 2018.

8 FISHER & PHILLIPS LLP

9
10 /s/ Whitney J. Selert, Esq.
11 Whitney J. Selert, Esq.
12 Holly E. Walker, Esq.
13 300 South Fourth Street
14 Suite 1500
15 Las Vegas, NV 89101
16 Attorneys for Defendants

17 Dated this 15th day of March, 2018.

18 LAW OFFICES OF MICHAEL P.
19 BALABAN

20
21 /s/ Michael P. Balaban, Esq.
22 Michael P. Balaban, Esq.
23 10726 Del Rudini Street
24 Las Vegas, NV 89141
25 Attorney for Plaintiff

26 IT IS SO ORDERED:



27 UNITED STATES MAGISTRATE JUDGE

28 This 16th day of March, 2018.